

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

KAINTE HICKEY,	)	
	)	
	)	
	)	
Plaintiff,	)	
v.	)	Case No. 1:24-cv-00449-RJJ-SJB
	)	
CORRECTIONAL OFFICER STUMP, <i>et al.</i> ,	)	
	)	
	)	Hon. Robert J. Jonker
Defendants.	)	
	)	
	)	

**MOTION TO PERMIT DISCOVERY PURSUANT TO RULE 26(d)**

Plaintiff Kainte Hickey, by and through his undersigned counsel, respectfully moves this Court for leave to propound limited discovery Pursuant to Federal Rule of Civil Procedure 26(d), to permit Plaintiff to discover identification information for several defendants.

In support of his motion Plaintiff states as follows:

1. This case involves the alleged sexual and physical assault of Kainte Hickey while incarcerated at the Bellamy Creek Correctional Facility (IBC) in Ionia, Ionia County, Michigan.
2. Plaintiff filed his above complaint in the above-captioned case on April 30, 2024.
3. The deadline to serve summons on all Defendants in this case is on July 29, 2024.
4. In order to serve Defendants pursuant to FRCP 4, Plaintiff requires the full identities and most recent addresses of all of the Defendants involved in this case.
5. Plaintiff has completed extensive searches through public record platforms such as LocatePLUS and True People Search and has not been successful in identifying full names and most recent addresses for the Defendants involved in this case.

6. By this motion to permit discovery, Plaintiff intends to obtain last known addresses of all Defendants to serve summons on all Defendants.

7. Plaintiff respectfully submits that this discovery is reasonably targeted to obtain the addresses and full names of Defendants Correctional Officer Stump, Correctional Officer Nelson, Correctional Sergeant Fox, Assistant Resident Unit Supervisory Craig Ritter, Deputy Warden Normington, Deputy Warden Jones, and Warden Richard McCarthy. *See* ECF 1.

**WHEREFORE**, Plaintiff requests that this Court enter an order pursuant to Rule 26(d) permitting Plaintiff to propound the limited discovery described in this motion.

Respectfully submitted,

/s/ Rachel Brady

Rachel Brady  
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